


6/29/2020

SO ORDERED.

LEWIS J. LIMAN
United States District Judge

RONALD FRANCIS
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June 29, 2020

Via ECF

The Honorable Lewis J. Liman
United State District Judge
Southern District of New York
500 Pearl Street, Room 710
New York, NY 10007

Re: Advanced Water Technologies, Inc. v. Amiad U.S.A., Inc.
Docket No. 1:18-cv-05473(LJL)

Dear Judge Liman:

I represent plaintiff Advanced Water Technologies, Inc. (“AWT”) in the above-referenced action. On June 27, 2020, this Court ordered AWT to submit a draft interrogatory to the Court for it to review and approve. The interrogatory addresses the search terms Amiad applied to collect documents in response to AWT’s document requests. Attached as Exhibit 1 is a draft of AWT’s Third Set of Interrogatories Pursuant to the Court’s June 27, 2020 Order. We will await the Court’s approval before we serve this interrogatory on defendant.

Thank you for your consideration of this matter.

Respectfully submitted,

Ronald Francis

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADVANCED WATER TECHNOLOGIES INC.,

Case No. :1:18-cv-05473-LJL

Plaintiff,

**PLAINTIFF’S DRAFT THIRD
SET OF INTERROGATORIES**

-against-

AMIAD U.S.A., INC.,

Defendant.
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Plaintiff Advanced Water Technologies Inc. (“AWT”) requests, pursuant to Rule 33 of the Federal Rules of Civil and the Court’s June 27, 2020 Order, that defendant Amiad U.S.A., Inc. (“Amiad”) answer the following interrogatory, under oath, with five (5) business days of it being served upon the undersigned to the law offices of Ronald Francis, located at 30 Broad Street, 37th Floor, New York, NY 10004.

This Interrogatory should be read, interpreted, and responded to in accordance with the instructions and definitions set forth in the Federal Rules of Civil Procedure and Local Civil Rules. Plaintiff reserves its right to serve supplemental interrogatories at a later date.

INTERROGATORY

1. State whether Amiad used search terms or filters to search Amiad’s electronic stored information (“ESI”) or other data in Amiad’s possession, custody, or control to identify ESI responsive to AWT’s document requests served on February 28, 2020. If so, identify each source of ESI searched, including email accounts, computer hard drives, or other storage media,

and identify the search terms and filters applied during the search of ESI.

Dated: New York, NY
June 29, 2020

RONALD FRANCIS, ESQ.

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